2:24mj1160 CMR

## **AFFIDAVIT**

I, Jared M. Dimick, being duly sworn, hereby depose and say:

- I am a Postal Inspector assigned to the United States Postal Inspection Service, Phoenix Division domiciled in Salt Lake City, Utah. I have been employed by the United States Postal Inspection Service since May 2015. In August 2015, I successfully completed the 12-week United States Postal Inspection Service Basic Inspector Training Program at the Career Development Unit located in Potomac, Maryland.
- 2. I am currently assigned to investigate a variety of federal violations to include controlled substances being transported via the United States Mails. As part of my duties as a Postal Inspector, I investigate crimes involving the United States Mail including Title 18, United States Code, Section 1716, Nonmailable Matter, Title 21, United States Code, Sections 841(a)(1), Possession with Intent to Distribute a Controlled Substance, 843(b), Unlawful use of a Communication Facility to Facilitate the Distribution of a Controlled Substance, and Title 18 United States Code, Section 1956, Laundering of monetary instruments. The facts and information contained in this affidavit have been obtained by me personally or provided to me by other law enforcement officers and postal employees. Since this affidavit is being submitted for the limited purpose of securing a search warrant from the court, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for the search warrant.

3.

- Based on my training and experience, I am aware that the United States Postal Service mail system is frequently used to transport illicitly used drugs, including controlled substances, and money associated with drug trafficking and other illicit activities to areas throughout the United States. I also know that many subjects prefer mail/delivery services such as Priority Mail Express because of the reliability and the ability to track the article's progress to the intended delivery point. The exceptionally fast service with Priority Mail Express is a big draw for senders of illicit money and drug parcels to get the items delivered in the least amount of time possible to avoid detection by law enforcement. Priority Mail Express is usually delivered within 1-2 days, which is a big draw for drug traffickers to get the product in their buyer's The drawback to Priority Mail Express is the cost of shipping is considerably higher than Priority Mail shipping. When a subject learns that a mailed article has not arrived as scheduled, he/she often becomes suspicious of any delayed attempt to deliver the item and may decline the parcel in fear that law enforcement is monitoring the delivery.
- 4. Based on my training and experience regarding the use of Priority Mail Express for the transportation of controlled substances and illicit proceeds through the U.S. Mail, I know these types of mailings often bear the following characteristics:
  - a. Fictitious names, alternate addresses, or incomplete names and/or addresses in an attempt to conceal their identity from law enforcement, most often by the sender of the parcel.
  - b. Cash payment for shipping to avoid detection by law enforcement.

- c. Parcels from California, particularly near the Mexico border are a well-known source for drug trafficking.
- d. Parcels mailed Priority Mail Express that weigh more than two pounds are often suspicious since the cost of shipping is so high.
- 5. Based on my training and experience, I know drug traffickers and their associates will often use fictitious names or incomplete names and/or addresses in an attempt to conceal their identity from law enforcement.

  Address verifications are conducted, and the return addresses listed on the articles are often either fictitious or sender names are not associated with the address.
- 6. This affidavit is made in support of an application for a search warrant on one
  (1) United States Postal Service Priority Mail Express parcel (SUBJECT PARCEL). The SUBJECT PARCEL is believed to contain illicit money or drugs as part of a drug trafficking scheme. The SUBJECT PARCEL is described as follows:
  - a. A United States Postal Service Priority Mail Express Parcel Tracking No.
    EI 037 167 825 US, addressed to Walter Verano, 5940 South Starlite Dr.,
    Murray, UT 84107, with a return address of Christine Verano, 3851
    Chamoune Ave, Apt 7., San Diego, CA 92105, shipped on December 2,
    2024, from the City Heights Post Office in San Diego, CA, via the United
    States Postal Service (USPS) weighing 4.8 lbs. with a shipment cost of
    \$79.00.

## **BACKGROUND INVESTIGATION**

- 7. On December 4, 2024, I intercepted the SUBJECT PARCEL at the Murray Post Office. I was suspicious of the parcel based on information I received from Davis Metro Narcotics Strike Force (DMNSF) Agent J. Lynch.
- 8. On December 2, 2024, Agent Lynch reported DMNSF and the FBI were conducting a search warrant at address 5940 S. Starlite Dr., Murray, UT 84107. The warrant was part of their investigation into a drug trafficking organization believed to be distributing large quantities of illegal drugs in the Salt Lake Valley area. During their search, agents found distributable amounts of suspected methamphetamine and fentanyl.
- 9. Agents searched the phone of "MP," who is suspected of distributing the illegal drugs during the warrant service. Agents found communications on the phone which provided a USPS tracking number and conversation related to drug trafficking. Agents found a photo of a USPS receipt from the suspected drug trafficker which showed parcel 9505 5138 1057 43319783 92 was mailed from San Diego on November 26, 2024.
- 10. I reviewed USPS delivery records for 5940 South Starlite Drive and found USPS Priority Mail parcel 9505 5138 1057 4331 9783 92 was mailed on November 26, 2024, and delivered November 29, 2024. This is the same parcel listed on the receipt found in the phone conversations between "MP" and the suspected drug trafficker. The parcel was mailed from San Diego and paid in cash at a USPS retail counter. I found the parcel was addressed to Walter Verano, 5940 South Starlite Dr., Murray, UT 84107 with a return

- address of Sarah Johnson, 6233 Romo St., San Diego, CA 92115. The name on that parcel matches the same name on the SUBJECT PARCEL.
- 11. I searched Clear, a database of public records used by law enforcement, and did not find the name Sarah Johnson associated with the address 6233 Romo St., San Diego, CA 92115 which is listed on the parcel. I also reviewed USPS parcel delivery records and did not see the name Sarah Johnson on any of the parcels. I believe the sender of the parcel delivered on November 29, 2024, used a fictitious name and return address in order to hide their identity, a common practice for drug trafficking through the mail. I believe that parcel contained illegal drugs based on the phone conversation records, the illegal drugs found in the residence, and the suspicious nature of the parcel.
- I searched USPS delivery records for the return address listed on the SUBJECT PARCEL: 3851 Chamoune Ave. Apt 7, San Diego, CA 92105, but did not find the name Christina Verano on any of the parcels delivered to the address. I searched Clear for the name "Christina Verano" at the address but did not find any association. I believe the return address information on the SUBJECT PARCEL is fictitious, a common practice by drug traffickers to conceal their identity.
- 13. On December 4, 2024, I met with DMNSF K-9 Officer T. Embley at the Farmington Post Office to conduct a drug detection sniff of the SUBJECT PARCEL. I placed four random parcels from the USPS workroom floor in a line with the SUBJECT PARCEL. I did not inform K-9 Officer Embley which parcel was believed to contain illegal drugs. K-9 Officer Embley conducted a sniff of the SUBJECT PARCEL and the other parcels with his K-

- 9 Maggie. K-9 Officer Embley reported K-9 Maggie indicated on the SUBJECT PARCEL for the presence of illegal drugs.
- 14. K-9 Officer Embley is a certified Peace Officer in the State of Utah and recertified through POST with K-9 Maggie on November 20, 2024. In addition to POST certification, Maggie is also certified through the National Police Canine Association, with her most recent certification on September 14, 2024. K-9 Maggie is certified in detecting the presence of methamphetamine, heroin, cocaine, fentanyl, and MDMA.

(Continued on next page)

15. Based on the aforementioned facts, your Affiant believes there is probable cause that the SUBJECT PARCEL described in Paragraph No. 6a contains controlled substances and/or proceeds from the trafficking of controlled substances, or other illegal activities that involve the movement of drugs or currency that would have the smell of drugs, constituting evidence of violations of Title 18, United States Code, Section 1716, Nonmailable Matter, Title 21, United States Code, Sections 841(a)(1), Possession with Intent to Distribute a Controlled Substance, 843(b), Unlawful use of a Communication Facility to Facilitate the Distribution of a Controlled Substance.

Jared M. Dimick United States Postal Inspector

Subscribed and sworn to before me on this  $5^{th}$  of December 2024.

CECILIA M. ROMERO

United States Magistrate Judge

Ceclia U. Romero

Approved as to form:

TRINA A. HIGGINS United States Attorney

/s/ Mark K. Vincent

MARK K. VINCENT

Assistant United States Attorney

## Parcel image:

